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Counsel to Plaintiff RDC Liquidating Trust

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK**

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Chapter 11

Case No. 20-20230 (PRW)

Advisory Trust Group, LLC, as trustee of the RDC
LIQUIDATING TRUST,

Adv. Proc. No. 22-02011-PRW

Plaintiff,

v.

BIODELIVERY SCIENCES INTERNATIONAL,
INC.,

Defendant.

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC ("Plaintiff" or the "RDC Liquidating Trust"), successor in interest to Rochester Drug Co-Operative, Inc. ("Debtor"), and defendant, Biodelivery Sciences International, Inc. ("Defendant" and, together with Plaintiff, the "Parties"), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the "Complaint") against Defendant;

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WHEREAS, the summons (the "Summons") was issued on February 4, 2022;
WHEREAS, on February 4, 2022, Defendant was served with the Summons and Complaint;
and

WHEREAS, on February 28, 2022, the Parties entered into a stipulation (the "First Stipulation") by which the time required for Defendant to answer the Complaint was extended through and including April 15, 2022. The First Stipulation was approved by order entered March 17, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. Defendant has recently obtained new counsel, and, as such, the Parties continue to negotiate and exchange information and have agreed, subject to Court approval, to further extend the time for the Defendant to answer the Complaint to and including June 15, 2022.
2. All other terms set forth in the First Stipulation remain in full force and effect.

Dated: April 13, 2022

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Ilan D. Scharf
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Counsel to Plaintiff RDC Liquidating Trust

SO ORDERED:

DATED: _____, 2022
Rochester, New York

Dated: April 11, 2022

TROUTMAN PEPPER HAMILTON
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Counsel to Defendant Biodelivery Sciences International, Inc.

HON. PAUL R. WARREN
United States Bankruptcy Judge